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★ MAY 23 2016 ★
BROOKLYN OFFICE

MKM:NEM
F. #2015R00888

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

I N F O R M A T I O N

- against -

JIAN GUO CHENG,
also known as "Yi Zuo,"

Cr. No. 16-272(CBA)
(T. 18, U.S.C., §§ 894(a)(1), 981(a)(1)(C)
and 3551 et seq.; T. 21, U.S.C., § 853(p);
T. 28, U.S.C., § 2461)

Defendants.

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THE UNITED STATES ATTORNEY CHARGES:

Extortionate Collection of Credit Conspiracy

1. On or about May 3, 2013, within the Eastern District of New York and elsewhere, the defendant JIAN GUO CHENG, also known as "Yi Zuo," together with others, did knowingly and intentionally conspire to participate in the use of extortionate means to collect and attempt to collect one or more extensions of credit from John Doe 1, an individual whose identity is known to the United States Attorney.

(Title 18, United States Code, Sections 894(a)(1) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

2. The United States hereby gives notice to the defendant JIAN GUO CHENG that, upon his conviction of the above-charged offense, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which requires any person convicted of such offense to forfeit any property, real or personal, constituting or derived from proceeds traceable to a violation of such offense.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461)



ROBERT L. CAPERS
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK